

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

TONY KHOURY, Individually and on Behalf : Civil Action No. 1:17-cv-00916-RA
of All Others Similarly Situated, :
:

Plaintiff, :

vs. :

FXCM INC., DROR NIV and ROBERT :
LANDE, :

Defendants. :

YING ZHAO, Individually and on Behalf of : Civil Action No. 1:17-cv-00955-UA
All Others Similarly Situated, :
:

Plaintiff, :

vs. :

FXCM INC., DROR NIV and ROBERT N. :
LANDE, :

Defendants. :

DAVID BLINN, Individually and on Behalf of : Civil Action No. 1:17-cv-01028-RA
All Others Similarly Situated, :
:

Plaintiff, :

vs. :

FXCM INC., DROR NIV and ROBERT N. :
LANDE, :

Defendants. :

x

NOTICE OF MOTION FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF,
AND APPROVAL OF LEAD PLAINTIFF'S SELECTION OF LEAD COUNSEL

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that proposed lead plaintiff Moshe Ariel (“Mr. Ariel”) will move this Court, on a date and time as may be designated by the Court, at 40 Foley Square, New York, NY 10007, for an order pursuant to the Private Securities Litigation Reform Act of 1995, 15 U.S.C. §78u-4(a)(3)(B), consolidating the above-captioned actions, appointing Mr. Ariel as Lead Plaintiff, and approving Mr. Ariel’s selection of Robbins Geller Rudman & Dowd LLP and Johnson & Weaver, LLP as Lead Counsel. In support of this motion, Mr. Ariel submits the accompanying Memorandum of Law, Declaration of David A. Rosenfeld, and a [Proposed] Order.

DATED: April 10, 2017

ROBBINS GELLER RUDMAN
& DOWD LLP
SAMUEL H. RUDMAN
DAVID A. ROSENFELD
ANDREW L. SCHWARTZ

/s/ David A. Rosenfeld

DAVID A. ROSENFELD

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[Proposed] Lead Counsel for Plaintiff

CERTIFICATE OF SERVICE

I, David A. Rosenfeld, hereby certify that on April 10, 2017, I authorized a true and correct copy of the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such public filing to all counsel registered to receive such notice.

/s/ David A. Rosenfeld

DAVID A. ROSENFELD